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5	Attorneys for Non-Party LIOR RON	
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7	UNITED STATES DISTRICT COURT	
8	NORTHERN DISTRICT OF CALIFORNIA	
9	SAN FRANCISCO DIVISION	
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11	WAYMO, LLC,	Case No.: 3:17-CV-00939 (WHA)
12	Plaintiff,	DECLARATION OF JONATHAN PATCHEN IN SUPPORT OF PLAINTIFF
13	VS.	WAYMO, LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
14 15	UBER TECHNOLOGIES, INC; OTTOMOTTO LLC; and OTTO TRUCKING LLC,	PORTIONS OF ITS REPLY IN SUPPORT OF MOTION FOR CONTINUANCE OF TRIAL DATE
16	Defendants.	Honorable William Alsup
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		1.
	DECLARATION OF JONATHAN PATCHEN IN SUPPORT OF WAYMO'S ADMINISTRATIVE MOTION TO SEAL: CASE NO. 3:17-CV-00939 (WHA)	

TAYLOR & PATCHEN, LLP 1

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I, JONATHAN PATCHEN, declare as follows:

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I am a partner in the law offices of Taylor & Patchen, LLP, a member in good standing of the bar of the State of California, and am admitted to practice before the United States District Court for the Northern District of California. I have personal knowledge of the matters set forth in this declaration, and if called upon to testify as a witness in this case, I could and would

testify competently under oath to all of the matters set forth in this declaration.

2. This declaration is submitted in support of Plaintiff Waymo, LLC's Administrative Motion to File Under Seal confidential information in its Reply in Support of Motion for Continuance of Trial Date, which is a non-dispositive motion.

- 3. Specifically, the four lines of yellow-highlighted text at pages 8:27-9:2 of the Memorandum of Points and Authorities in support of Plaintiff Waymo, LLC's Reply in Support of Motion for Continuance of Trial Date ("Continuance Motion") make reference to portions of the Stroz due diligence report, which are the subject of Non-Party Lior Ron's September 19, 2017 Motion to Intervene and Motion for Protective Order (Dkt. 1686). That motion is currently pending before the Court.
- 4. Upon information and belief, the due diligence report was prepared by Stroz pursuant to a series of written and oral agreements specifying that the report was privileged and confidential. See Dkt. 370 (Declaration of Eric A. Tate ISO Defs' Opp. to Mtn. to Compel) at ¶¶ 11–16, 18–20, 30; Dkt. 375 (Declaration of Alisa J. Baker ISO Defs' Opp. to Mtn. to Compel) at ¶¶ 7–17. As such, Mr. Ron had a reasonable expectation that the due diligence report's contents would remain confidential.
- 5. Upon information and belief, the references in the Continuance Motion to the Stroz due diligence report contain information that, if made available to the public, could subject Mr. Ron to prejudicial harm, including reputational harm and scrutiny would severely prejudice his interests in a separate arbitration proceeding. See Dkt. 1686.

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1	6. Mr. Ron's request to keep this particular information under seal, limited to the four		
2	lines of text highlighted at lines 8:27–9:2 in the Continuance Motion, is narrowly tailored to seal		
3	only that information which is potentially prejudicial and harmful to Mr. Ron's personal interests.		
4	I declare under penalty of perjury, under the laws of the United States of America, that the		
5	foregoing is true and correct. Executed this 22nd day of September, 2017, at Lena, Louisiana.		
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7	/s/ Jonathan A. Patchen		
8	JONATHAN A. PATCHEN		
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TAYLOR & PATCHEN, LLP